



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/782-6762

January 26, 2003

Mr. Nabil Fayoumi
U.S. EPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: 1631215032 St. Clair County
Sauget Area 2 Site
Superfund/Technical
Remedial Design/Remedial Action Workplan

Dear Mr. Fayoumi:

The Illinois Environmental Protection Agency ("Illinois EPA") received a copy of the Sauget Area 2 Sites Group ("SA2SG") Remedial Design/Remedial Action Workplan for the Sauget Area 2 Groundwater Operable Unit, dated December 19, 2002, on December 20, 2002.

Based upon my review of this submittal, I have the following comments for your consideration. The comments follow the same numbering format as the submittal.

Section 2.2.1.1, page 2-1

The Prefinal Design submittal, referenced under Section 3.3, must include design assumptions and parameters for the single panel barrier wall. At this time, Illinois EPA cannot recommend approval or disapproval of this design component.

Section 2.2.1.1, page 2-2

Second paragraph. The Upper Hydrogeologic Unit is described as representing 1 percent of the total flux discharging to the river, based on groundwater modeling performed during the Focused Feasibility Study ("FFS"). The Prefinal Design must include specific references to the groundwater modeling in the FFS.

Last paragraph. The Prefinal Design must include a technical explanation for how "minimal gaps" and "minor discontinuities" will require higher pumping rate to equalize groundwater levels on the upgradient and downgradient sides of the barrier. It would appear that gaps and discontinuities would tend to equalize groundwater levels on the upgradient and downgradient sides. Further, since the pumping rate will be adjusted to

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maintain equal levels upgradient and downgradient, as opposed to creating a zone of depression, it would appear the pumping rate adjustment cannot be used to compensate for gaps or discontinuities in the wall.

Section 2.2.2.2, pages 2-4, 2-5.

First bullet. The Prefinal Design must explain the rationale for not screening the piezometers across the Shallow Hydrogeologic Unit, given that the wall will not extend into the Shallow Hydrogeologic Unit. The piezometers should measure the performance of the wall design. Additionally, details on how the pump rate will be primarily controlled by river level must be included in the Prefinal Design, subject to approval. Finally, the water level differentials need to be the "same", as written in the FFS (p.1-27), not "minimized".

Section 2.3, page 2-6.

A brief discussion should be provided on the role of the U.S. Environmental Protection Agency, Illinois EPA, and oversight contractor.

Section 3.5.1, page 3-4.

Add a bullet item for "Summary of inspection activities including the pre-construction meeting, regular progress meetings, pre-final and final inspections, etc."


The CQAP needs to specify procedures that will be followed for notification/approval of project modifications, including a description of minor, significant changes during construction, and the notification/review/approval process for changes during construction.

Section 4.2, page 4-2.

Add a section for regular progress meetings, between the pre-construction inspection, and the prefinal inspection.

Should you have any questions or comments on the contents of this letter, please feel free to contact me at 217/557-3199.

Sincerely,



Sandra Bron, Remedial Project Manager
National Priorities List Unit
Federal Site Remediation Section
Bureau of Land